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11 *Attorneys for Plaintiffs*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 PATRICIA FITZPATRICK and ROBERT)
15 L. ANSARA, as Special Co-Administrators)
16 and Personal Representatives of the Estate)
of JEREMIAH BOWLING, deceased; and)
17 PATRICIA FITZPATRICK, as Heir and)
Mother of JEREMIAH BOWLING,)
deceased,)

18 Plaintiffs,
19 v.

20 LAS VEGAS METROPOLITAN POLICE)
DEPARTMENT, a political subdivision of)
21 the State of Nevada; THOMAS STRIEMER,)
Corrections Officer, individually and in his)
22 official capacity; ANGELO LARRY,)
Corrections Officer, individually and in his)
23 official capacity; ROLANDO TREVINO,)
Corrections Officer, individually and in his)
24 official capacity; and NAPHCARE, INC., an)
Alabama corporation,)

25 Defendants.
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Case No.: 2:17-cv-1886-JAD-BNW
**STIPULATION TO CONTINUED
FRCP 30(b)(6) DEPOSITION OF
LAS VEGAS METROPOLITAN
POLICE DEPARTMENT TO
JUNE 19, 2020**

COME NOW PLAINTIFFS PATRICIA FITZPATRICK and ROBERT L. ANSARA, by and through their counsel of record, NADINE M. MORTON ESQ. of MORTON LAW, PLLC, and A. J. SHARP, ESQ. of SHARP LAW CENTER, Defendant THOMAS STRIEMER and Third Party LAS VEGAS METROPOLITAN POLICE DEPARTMENT, by and through their counsel of record, ROBERT W. FREEMAN, ESQ. of LEWIS BRISBOIS BISGAARD & SMITH LLP, and Defendant NAPHCARE, INC., by and through its counsel of record, S. BRENT VOGEL, ESQ. of LEWIS BRISBOIS BISGAARD & SMITH LLP (collectively herein, the “Parties”), and Stipulate to conduct the continued deposition of Las Vegas Metropolitan Police Department, pursuant to FRCP 30(b)(6), from Friday, April 3, 2020, to **Friday, June 19, 2020, at 10:00 a.m.**

PROCEDURAL BACKGROUND

On February 14, 2020, this Court granted the Parties’ Stipulation to conduct the continued FRCP 30(b)(6) deposition of Las Vegas Metropolitan Police Department (“LVMPD”) on April 3, 2020. *Docket Filing #132*.

However, counsel for LVMPD has represented that, in light of the ongoing coronavirus/COVID-19 pandemic, counsel’s office (the location of the deposition) is undergoing structural changes to enable employees to maintain appropriate distances while working, to avoid the spread of the virus. In addition, counsel would have to meet in-person with Sergeant Albright, LVMPD’s FRCP 30(b)(6) designee, to properly prepare him for the deposition, a potentially extended meeting that is inadvisable under the circumstances.

Finally, the Parties agree that conducting this deposition on April 3, 2020 (less than two weeks from now) will likely be untenable under Governor Sisolak’s current Orders, and would in any event be ill-advised, as it requires in-person contact that can readily be avoided.

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1 The Parties therefore have agreed to Stipulate, subject to this Court's approval, to conduct
2 the continued FRCP 30(b)(6) deposition of LVMPD on **Friday, June 19, 2020, at 10:00 a.m.** The
3 Parties further stipulate that, should LVMPD counsel's office be unavailable to host the deposition
4 on that date, the Parties will work together to identify and utilize an alternative location.

5 The Parties aver that good cause exists for the requested stay and that this Stipulation is not
6 submitted for purposes of delay.

7 DATED this 23rd day of March, 2020.

DATED this 23rd day of March, 2020.

8 **MORTON LAW, PLLC**

**LEWIS BRISBOIS BISGAARD &
SMITH**

9 /s/ Nadine M. Morton

/s/ S. Brent Vogel

10 Nadine M. Morton, Esq.

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14 *Attorney for Plaintiffs*

Attorneys for Defendant

Naphcare, Inc.

15 DATED this 23rd day of March, 2020.

16 **LEWIS BRISBOIS BISGAARD
& SMITH**

17 /s/ Robert W. Freeman

18 Robert W. Freeman, Jr., Esq.

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22 *Attorneys for Defendant Thomas Strierner*

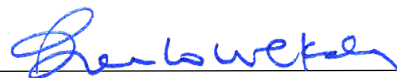
and Third Party Las Vegas Metropolitan

23 *Police Department*

ORDER

24 IT IS SO ORDERED.

25 Dated this 1st day of April, 2020.

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28 UNITED STATES MAGISTRATE JUDGE